SCO ANNUAL TRAINING REQUIREMENTS

FY’20 SCO ANNUAL TRAINING UPDATE
On March 11, 2020 the World Health Organization (WHO) officially declared Coronavirus (COVID-19) an international pandemic. To stop the spread of coronavirus, health and government officials recommended avoiding large gatherings and maintaining 6-feet from other people, commonly known as, social distancing.

Due to social distancing recommendations the SCO training conference season was interrupted, which impeded School Certifying Officials (SCOs) ability to adhere to the requirements of Section 305 of the Harry W. Colmery Veterans Educational Assistance Act of 2017.

Section 305 (Training for School Certifying Officials) of the Colmery Act, requires the Department of Veterans Affairs (VA), in consultation with State Approving Agencies (SAAs), to develop and administer mandatory training for School Certifying Officials (SCOs) at “covered educational institutions.” This mandate was effective August 1, 2018.

Due to the Coronavirus (COVID-19) pandemic; training for SCOs at national, regional, and local conferences were postponed or cancelled; which impedes the SCO’s ability to fulfill their annual training requirement by July 31, 2020.

To support and assist SCOs in fulfilling the FY’20 training requirements:

- The training cycle is extended 30-days to August 31, 2020
- Face-to-face conference training is restructured to include additional self-paced training modules and instructor-led virtual training events.

The extended schedule for SCOs FY’20 Annual training is as follows:

- **August 1, 2019:** Annual Training Window Opened. Updated training requirements for all new SCOs and continuing education requirements for existing SCOs are effective.
- **June 2, 2020:** 90-Day Training Alert! Notifications and reminders of the approaching August 31st continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice.
- **July 2, 2020:** 60-Day Training Alert! Notifications and reminders of the approaching August 31st continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice.
- **August 1, 2020:** 30-Day Training Alert! Notifications and reminders of the approaching August 31st continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice.
- **August 31, 2020:** Annual Training Window Closes! Continuing education requirements for existing SCOs completed.
- **September 1-30, 2020:**
  - **EXISTING SCOs - NO TRAINING IN PROGRESS (September 1-30)**
NEW SCOs - TRAINING IS CONTINUOUS THROUGHOUT THE YEAR

- Covered institutions list generated and posted on the SCO Training portal for FY’21 training cycle.
- SCO training compliance reported to:
  - Covered Institutions and SCOs
  - State Approving Agencies (SAAs)
  - VA Leadership & Stakeholders
- Update SCO Training requirements for FY’21
- Upload new SCO Training materials for FY’21

October 1, 2020: FY’ 21 Annual Training Window Opens! Updated training requirements for all new SCOs and continuing education requirements for existing SCOs are effective.

LEGISLATION
This section provides the legislative text associated with Section 305 of the Harry W. Colmery Veterans Educational Assistance Act of 2017, also known as the “Colmery Act.”

SEC. 305. TRAINING FOR SCHOOL CERTIFYING OFFICIALS.

(a) TRAINING REQUIREMENT—The Secretary of Veterans Affairs shall, in consultation with the State approving agencies, set forth requirements relating to training for school certifying officials employed by covered educational institutions offering courses of education approved under chapter 36 of title 38, United States Code. If a covered educational institution does not ensure that a school certifying official employed by the educational institution meets such requirements, the Secretary may disapprove any course of education offered by such educational institution.

(b) DEFINITIONS — In this section: H. R. 3218—21

(1) The term “covered educational institution” means an educational institution that has enrolled 20 or more individuals using educational assistance under title 38, United States Code.

(2) The term “school certifying official” means an employee of an educational institution with primary responsibility for certifying veteran enrollment at the educational institution.

(3) The term “State approving agency” means a department or agency of a State designated under section 3671 of title 38, United States Code.

(c) EFFECTIVE DATE —This section shall take effect on August 1, 2018.

POLICY INTERPRETATION
Date of Enactment: August 1, 2018

i. Authorizes VA, in consultation with the State Approving Agencies (SAAs), to provide training requirements for school certifying officials.

ii. If an educational institution does not ensure that all active school certifying official meets the training requirements, the ELR will remove their ability to certify to VA and refer the institution
to the SAA for review and determination on suspension or withdrawal actions in accordance with Colmery Act section 305.

iii. A "covered educational institution" would refer to an educational institution that has enrolled 20 or more individuals using VA educational assistance.

Successful implementation of Section 305 of the Harry W. Colmery Veterans Educational Assistance Act of 2017 would result in a national training plan for all School Certifying Officials, a lower rate of incorrect overpayments and underpayments of education benefits, and better service to Veterans, Servicemembers, and their families.

COVERED EDUCATIONAL INSTITUTIONS

A “Covered Educational Institution” is an educational institution that has enrolled 20 or more individuals during a calendar year, using VA educational assistance under Title 38, United States Code. This includes main, branch and extension campuses approved by the SAA.

Every year, VA will generate a list of Covered Educational Institutions using the Active Facility Report (AFR) and will publish that list on the SCO training webpage. The covered institution list will indicate which institution’s SCOs are required to take training each fiscal year.

- Covered institutions will be identified based on the number of VA individuals enrolled between January 1 and December 31 of the prior year.

- In FY’20 there were 4,627, covered institutions with 20 or more individuals using educational assistance under Title 38, United States Code. Covered institutions included benefits paid for Chapters 30, 32, 33, 35, 1606, 1607 and Chapter 31.

- Covered Educational Institutions may be verified on the SCO training portal. Questions regarding covered educational institutions should directed to the ELR of jurisdiction.

TRAINING AUDIENCE

The primary training audience for Section 305 training are School Certifying Officials at institutions approved for GI Bill benefits. Each school is required to designate at least one VA Certifying Official to carry out reporting requirements. VA recommends one (1) SCO full-time employee (FTE) for every 200 GI-Bill beneficiaries enrolled in the educational institution.

The law defines a “School Certifying Official”, for the purposes of these provisions, to mean an employee of an educational institution with the primary responsibility for certifying Veteran enrollment at the educational institution.

- All those designated as a Certifying Official on the VA Form 22-8794 (Designation of School Certifying Officials) at Covered Educational Institutions will be required to take annual training.

- Those designated as a “read-only” Certifying Officials on the VA Form 22-8794 are exempt from the annual training requirement. A “read-only” Certifying Official is identified as an individual at an institution that the school has identified to access read-only or inquiry only information.

FY’ 20 TRAINING REQUIREMENTS

Each year the VA will mandate specific training requirements to be completed by SCOs. Training requirements are evaluated annually and are determined based on:
• **Compliance Survey Results** – Issues or discrepancies identified during compliance surveys that need to be addressed nationally.

• **VA Mandated Training** - To address specific agency and department needs or legislative changes, policy, procedural updates, or Government Accountability Office (GAO) requirements.

• **Refresher Training** – To address new skills, methods, and processes required to improve performance on the job.

• **SCO Requested Training** – School Certifying Officials may identify a need and request national training on topics that impact the SCO community.

**NEW SCHOOL CERTIFYING OFFICIALS**

Effective August 1, 2019, all new SCOs at educational institutions that enrolled one or more individual(s) using educational assistance under title 38, United States Code are required to complete VA specified training applicable to their facility type.

A new SCO is an individual who began work as a SCO on or after the beginning of the annual training cycle (August 1, 2019), regardless of the number of beneficiaries.

New SCOs:

• Are required to complete the online training modules specific to their facility type prior to being authorized to certify to the VA.

• Are required to self-register in the [SCO Online training portal](#).

• Must submit the VA Form 22-8794 (Designation of School Certifying Officials) and a copy of their training certificates to their ELR of jurisdiction prior to being authorized to certify VA student enrollments.

• Will not be authorized to certify VA student enrollment until training is completed.

• That complete the initial training have fulfilled the requirement for the fiscal year and will be required to take Existing SCO training during the next training cycle.

• At IHL and NCD facilities are required to complete ten (10) online training modules (approximately 5 hours of training).

• At OJT and Apprenticeship facilities are required to complete one (1) online training module (approximately 1.5 hours of training) specific to his or her facility type.

• At Vocational Flight facilities are required to complete one (1) online training module (approximately 1.5 hours of training) specific to his or her facility type.

• For High School and Residency Programs are required to complete one (1) online training module (approximately 1.5 hours) applicable to his or her facility type. Future updates to this module will include scenarios specific to these two facility types.
EXISTING SCHOOL CERTIFYING OFFICIALS
Effective August 1, 2019, all existing SCOs at Covered Educational Institutions that enrolled twenty (20) or more individual(s) using educational assistance under title 38, United States Code are required to complete VA specified training applicable to their facility type.

An existing SCO is an individual who began work prior to the beginning of the annual training cycle (August 1, 2019) and has access to VA systems for the purposes of certifying student enrollments.

Existing SCOs:

- Are required to complete the online training modules specific to their facility type.
- Are required to self-register in the SCO Online training portal.
- At IHL, NCD, and Vocational Flight facilities are required to complete 5 hours of training.
  - A minimum of two online training modules specific to their facility type and a choice of elective modules to reach the 5-hour requirement.
  - Completion of online training modules are mandatory for all facility types however SCOs may choose any combination of the electives online and/or qualifying VA sessions presented at National, Regional or local conferences.
- At OJT and Apprenticeship facilities are required to complete 1.5 hours of training, consisting of one (1) online training module specific to the facility type.

READ-ONLY SCOS
A Read-only SCO is an individual at an educational institution with permission to access enrollment information, request information, and submit inquiries to VA to assist an authorized SCO with obtaining accurate information to certify student’s enrollment. The educational institution must provide the ELR with the name(s) of the Read-Only SCOs on the VA Form 22-8794 before their information is entered in WEAMS.

Read-Only SCOs:

- Are not required to take SCO training
- Are not authorized to certify student’s enrollment to VA.

TRANSFERRING SCOs
Transferring SCOs:

- Who successfully completed the annual training and transfer to another institution of the same facility type before the end of the training cycle are not required to retake the training.
  - These SCOs should change the facility code in the SCO training portal
  - Keep all training certificates for their records
- Who transfer to a different facility type (i.e. IHL to Vocational Flight), must complete the online training modules specific to their facility type prior to being authorized to certify to the VA.

- Must submit the VA Form 22-8794 (Designation of School Certifying Officials) and a copy of their training certificates to their ELR of jurisdiction prior to being authorized to certify VA student enrollments.

**FY’20 APPROVED SCO TRAINING TOPICS**

The SCO training program consists of multiple training topics designed to present the concepts and procedures necessary for a SCO to successfully perform the basic functions of their duties. Below are the topics approved for the FY’20 training cycle.

<table>
<thead>
<tr>
<th>NEW SCOS - TRAINING TOPICS (ONLINE ONLY – SELF PACED)</th>
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<tbody>
<tr>
<td>Module - 1</td>
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<td>Module - 2</td>
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<td>Module - 3</td>
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<td>Module - 4</td>
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<td>Module - 10</td>
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<table>
<thead>
<tr>
<th>Existing SCO – Mandatory Training Topics (Online Only – Self Paced)</th>
<th>Credit Hours</th>
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<tbody>
<tr>
<td><strong>BY FACILITY TYPE</strong></td>
<td></td>
</tr>
<tr>
<td>INSTITUTIONS OF HIGHER LEARNING (IHLs)</td>
<td></td>
</tr>
<tr>
<td>1 IHL Only</td>
<td>1.5</td>
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<tr>
<td>2 VA-ONCE for IHLs</td>
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<tr>
<td><strong>IHLs TOTAL MANDATORY ONLINE TRAINING HOURS</strong></td>
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### Institutions of Higher Learning (IHLs) with Non-College Degree Programs (NCDs)

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<th></th>
<th>Description</th>
<th>Hours</th>
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<tbody>
<tr>
<td>1</td>
<td>IHL with NCDs</td>
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<tr>
<td>2</td>
<td>VA-ONCE for IHLs</td>
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**IHLs with NCDs Total Mandatory Online Training Hours**

3.5

### Institutions of Higher Learning (IHLs) with Flight Programs

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<th>Description</th>
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<tr>
<td>1</td>
<td>IHL with Flight</td>
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<tr>
<td>2</td>
<td>VA-ONCE for IHLs</td>
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</table>

**IHLs with NCDs Total Mandatory Online Training Hours**

3.5

### Non-College Degree Programs (NCDs)

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<tr>
<th></th>
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<td>2</td>
<td>VA-ONCE for NCDs</td>
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**NCD Total Mandatory Online Training Hours**

2.5

### Vocational Flight

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<td>Vocational Flight Only</td>
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**Vocational Flight Total Mandatory Online Training Hours**

1.5

### OJT/Apprenticeship

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<th>Description</th>
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<tbody>
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<td>OJT/Apprenticeship</td>
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</table>

**OJT/Apprenticeship Total Mandatory Online Training Hours**

1.5
## Existing SCO – Elective Training Topics

<table>
<thead>
<tr>
<th>Conference (In-Person Instructor-Led), Virtual Instructor Led, Online Self-Paced</th>
<th>Credit Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 New School Certifying Official Training</td>
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</tr>
<tr>
<td>2 Advanced School Certifying Official Training</td>
<td>2</td>
</tr>
<tr>
<td>3 Compliance Surveys</td>
<td>2</td>
</tr>
<tr>
<td>4 Flight School Program at IHLs</td>
<td>1</td>
</tr>
<tr>
<td>5 Certification Process for Non-College Degree (NCD) Programs</td>
<td>1</td>
</tr>
<tr>
<td>6 Education Programs and Benefits</td>
<td>1</td>
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<tr>
<td>7 Program Approval and the State Approving Agency</td>
<td>1</td>
</tr>
<tr>
<td>8 Yellow Ribbon</td>
<td>1</td>
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<tr>
<td>9 Work-Study</td>
<td>1</td>
</tr>
<tr>
<td>10 School Liability</td>
<td>1</td>
</tr>
<tr>
<td>11 Debt Management Center</td>
<td>1</td>
</tr>
</tbody>
</table>

### SCO TRAINING APPROVED LOGO
VA has added a "SCO Training Approved" logo on all the qualifying training materials, so both SCOs and VA staff know which topics qualify for Section 305 Annual Training credit.
TRAINING MODALITIES
There are three basic training modalities for the SCO Annual training:

- **Online Self-Paced Training** – Modules for both new and existing SCOs were developed in on the Captivate platform and housed on the SCO training portal on the GI-Bill website.

- **Virtual Instructor-Led Training** – VA hosts scheduled virtual training events with live instruction and participation that qualify for Section 305 annual training credit.

- **Instructor-Led Conference Training** – Modules primarily for existing SCOs were developed for delivery at a National, Regional, Local Conference or Workshop offering SCO Annual Training.

TRAINING CREDIT AND TRACKING
The National Training Team – Compliance gives training credit and tracks training completion using the SCO training portal supported and administered by the Office of Talent Management (OTM).

The training modality will determine the process of issuing credit and tracking training.

- **Online Self-Paced Training** – Credit for online self-paced training is given automatically after the completion of a module in the SCO training portal. Participants can immediately download their certificate and their training time is recorded in the system’s database. In addition, the total training hours completed are recorded in the user’s online profile.

Both **Instructor-Led Conference Training** and **Virtual Instructor-Led Training** require a two-step process for participants to earn credit and have their training tracked.

- **Training Attendance** – Participants must record their attendance using the Menti code given at the session or an alternative attendance tracking method designated by the presenter.
  
  o Mentimeter is a cloud-based solution that allows you to engage and interact with your target audience in real-time. It is a polling tool wherein you can set the questions and your target audience can give their input using a mobile phone or any other device connected to the Internet.

- **Self-Certification** – Upon completion of the training session participants are required to go to the SCO Training Portal and certify each session attended (located under the Conference/Virtual Training tab). By completing the certification form they are certifying that they attended the training in-person and documented their attendance at the training session.
  
  o Upon completion of the self-certification process, participants can print a training certificate for their records and their training hours will be posted in their online profile.

TRAINING COMMUNICATION
Throughout the year, VA communicates to all schools about the annual training requirements for SCOs. The methods of communication are through the Chief Education Liaison Officers (CELOs) via the ELRs, directly to the schools via GovDelivery, information sessions at school conferences, regular webinars,
posting on SCO Resource page on the GI Bill website, and an letter to schools annually informing them of the annual training requirements.

**TRAINING COMPLIANCE**
**Compliance for Existing SCOs - Effective Aug. 1, 2019**

- When covered institutions fail to complete the required training by the end of the training cycle, a notification via gov.delivery will be sent of the delinquency informing the institution of the impending loss of their ability to certify enrollments to VA.

- If covered institution remains non-compliant after the end of the training cycle the ELR will remove their ability to certify to VA and refer the institution to the SAA for review and determination on suspension or withdrawal actions in accordance with Colmery Act section 305.

- Non-Compliant SCOs at covered institutions will be required to take the "New SCO training" to restore their ability to certify enrollments to the VA.

- SCOs should contact the ELR of jurisdiction regarding reinstating the school's ability to certify enrollments to the VA.

**SCHOOL CERTIFYING OFFICIALS RESOURCES:**

- School Certifying Official (SCO) Training
- School Certifying Officials Resource Page
- School Certifying Officials Handbook
- Covered Institutions List